

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

BUDINGER WINDMILL TRUST,

Case No.: 6:13-bk-09907-KSJ

Chapter 11

Debtor.

**DEBTOR'S APPLICATION TO AUTHORIZE EMPLOYMENT
OF WOLFF, HILL, McFARLIN & HERRON, P.A. AS ATTORNEYS**

Budinger Windmill Trust. (the "Debtor") applies for entry of Order authorizing the employment of Kenneth D. Herron, Jr. and the law firm of Wolff, Hill, McFarlin & Herron, P.A. (collectively "WHMH") and says:

1. On August 8, 2013 the Debtor filed a voluntary petition seeking relief under Chapter 11 of the Bankruptcy Code.
2. The Debtor retained WHMH as its attorney in this case.
3. WHMH was retained, because the members of the law firm:
 - a. have considerable experience in Chapter 11 bankruptcy cases, and
 - b. are well qualified to represent the Debtor in this case.
4. The professional services that WHMH will render include:
 - a. providing advice and counsel to the Debtor-in-Possession concerning the operation of its business in compliance with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, this Court's Local Rules and Orders entered by this Court;

b. file and defend, as necessary, any causes of action on behalf of the Debtor-in-Possession;

c. prepare, on behalf of the Debtor-in-Possession, all necessary applications, motions, reports, and other legal papers in this Chapter 11 case;

d. assist in the formulation of a plan of reorganization and preparation of a disclosure statement; and

e. provide all services of a legal nature in the field of bankruptcy law.

4. This application is for WHMH to serve as general bankruptcy counsel for the Debtor.

5. The Debtor has agreed to the proposed arrangement for compensation as set forth in the disclosure of compensation.

6. To the best of the Debtor's knowledge, WHMH:

a. has no connection with the debtors, creditors, and any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States;

b. do not hold or represent any interest adverse to the estate; and

c. is disinterested as is more specifically set forth in the verified disclosure of compensation.

5. The Debtor contends that the employment of WHMH is in the best interest of the Debtor.

Relief Requested

For the reasons stated above, the Debtor requests the entry of an Order authorizing the employment of WHM&H as attorneys for the debtor-in-possession.

Signed this 20th day of August, 2013.

Budinger Windmill Trust

by: Budinger Windmill, LLC, Trustee

by: 
Randy Sheive, Manager